

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	
Plaintiffs and)	
Counterdefendants,)	
)	
v.)	C.A. No. 20-613 (SB)
)	
ROSS INTELLIGENCE INC.,)	
)	
Defendant and)	
Counterclaimant.)	

PLAINTIFFS' LETTER REGARDING SUMMARY JUDGMENT HEARING

Dear Judge Bibas:

In response to this Court's order (D.I. 692), Plaintiffs Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation respectfully seek guidance regarding the scope and format of the upcoming hearing scheduled for December 5-6.

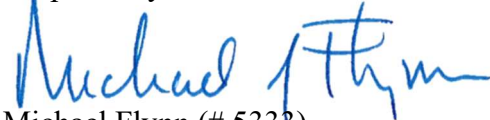
We understand that the Court has allocated two days for oral arguments. Given the nature of summary judgement proceedings, where the Court's role is not to make credibility determinations or weigh evidence¹ – we seek clarifications on the Court's expectations for this hearing to ensure our preparation aligns.

Specifically, Plaintiffs request guidance on the following:

1. The specific issues the Court wishes to focus on during the hearing.
2. Any particular format or structure the Court prefers for the presentations.
3. Whether the Court anticipates any time limitations for arguments from each party.

We aim to facilitate a productive and efficient hearing and appreciate any additional guidance the Court can provide.

Respectfully,

A handwritten signature in blue ink that reads "Michael Flynn". The signature is stylized with a large "M" and a long, sweeping "F".

Michael Flynn (# 5333)
Counsel for Thomson Reuters

cc: All Counsel of Record

¹ “Credibility determinations, the weighing of the evidence, and the drawing of legitimate inferences from the facts are jury functions, not those of a judge, whether he is ruling on a motion for summary judgment or for a directed verdict.” *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 255 (1986); *see also Stoval v. N.J. Judiciary*, No. CV 06-5683 (RMB/JS), 2009 WL 10727956, at *1 (D.N.J. Dec. 8, 2009) (“The purpose of summary judgment—providing a speedy adjudication in cases that present no genuine dispute of material fact—would be compromised if the summary-judgment hearing became a preliminary trial.”)